



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ALC/LHE/SME
F. #2016R00505

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 6, 2018

By ECF and Email

William A. Burck, Esq.
Quinn Emanuel Urquhart & Sullivan, LLP
777 6th Street NW, 11th Floor
Washington, D.C. 20001

Michael S. Sommer, Esq.
Wilson Sonsini Goodrich & Rosati P.C.
1301 Avenue of the Americas, 40th Floor
New York, New York 10019

Gregory J. O'Connell, Esq.
De Feis O'Connell & Rose, P.C.
500 Fifth Avenue, Suite 2630
New York, New York 10110

Kevin J. O'Brien, Esq.
Ford O'Brien LLP
85 Broad Street, 28th floor
New York, New York 10004

Jonathan S. Sack, Esq.
Morvillo, Abramowitz, Grand, Iason &
Silberberg P.C.
565 Fifth Avenue
New York, New York 10017

Seth L. Levine, Esq.
Levine Lee LLP
650 Fifth Avenue, 13th Floor
New York, New York 10019

Michael D. Mann, Esq.
Sidley Austin LLP
787 Seventh Avenue
New York, New York 10019

Re: United States v. Mark Nordlicht, et al.
Criminal Docket No. 16-640 (BMC)

Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This disclosure supplements the government's earlier disclosures by letters dated January 23, 2017, January 26, 2017, February 14, 2017, February 24, 2017, March 9, 2017, March 27, 2017, April 3, 2017, April 12, 2017, April 26, 2017, May 5, 2017, May 11, 2017, May 26, 2017, June 16, 2017, June 20, 2017, July 3, 2017, July 6, 2017, July 17, 2017, July 27, 2017, August 21, 2017, August 22, 2017, August 30, 2017, September 15, 2017, October 4, 2017, November 7, 2017 and December 26, 2017. The government again requests reciprocal discovery from the defendants.

Defense Counsel

March 6, 2018

Page 2

The government has made available at First Choice Copy (“First Choice”), for reproduction to the defendants a collection of documents produced to the government by the United States Securities and Exchange Commission (the “SEC”). These documents include materials produced to the SEC by:

- B Asset Manager: SEC-NY-09271-EPROD-004384213 – SEC-NY-09271-EPROD-004446654;
- Capital One: SEC-NY-09271-EPROD-004446655 – SEC-NY-09271-EPROD-004448889;
- Old Mutual Bermuda Holdings: SEC-NY-09271-EPROD-004448890 – SEC-NY-EPROD-004492074;
- American Express: SEC-NY-09271-EPROD-004494878 – SEC-NY-EPROD-004494881;
- The Bermuda Monetary Authority: SEC-NY-09271-EPROD-004494882 – 4494883;
- The Cayman Islands Monetary Authority: SEC-NY-EPROD-004494884 – SEC-NY-EPROD-004494885;
- JP Morgan Chase: EC-NY-09271-EPROD-004494886 – SEC-NY-EPROD-004495292; and
- The SEC’s Office of Compliance Inspections and Examinations (“OCIE”): SEC-NY-004495293 – SEC-NY-004543904.

Additionally, enclosed with this letter are documents produced by a Platinum Partners Value Arbitrage Fund, L.P. investor. The government will supply further details to you under separate cover.

Very truly yours,

RICHARD P. DONOGHUE
Acting United States Attorney
Eastern District of New York

By: /s/
Alicyn L. Cooley
Lauren H. Elbert
Sarah M. Evans
Assistant U.S. Attorneys
(718) 254-7577 (Elbert)

cc: Clerk of the Court (BMC) (by ECF) (w/o enclosures)